

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MRS. UNITED STATES NATIONAL PAGEANT, INC.,

Plaintiff,
vs.

**DECLARATION OF
KATY MOODY CUSICK**

Case No. 6:18-cv-06587

STEPHANIE L. WILLIAMS, CROWN GARLAND LLC, and
COSMOS INTERNATIONAL PAGEANTS, INC.

Defendants.

COMMONWEALTH OF KENTUCKY)
COUNTY OF WARREN) ss:

KATY MOODY CUSICK declares under penalty of perjury that:

1. I am an individual residing in Bowling Green, Kentucky. I make this Declaration at the request of Plaintiff Mrs. United States National Pageant, Inc. (“Mrs. United States”).
2. In 2014, I participated in a state-level Mrs. United States pageant held in Kentucky. I was crowned Miss Kentucky United States and participated in the National Miss United States Pageant (the “National Pageant”). Every year, the winners of the state-level Mrs. United States pageants compete in the National Pageant. At the National Pageant, I placed third-runner-up and won Miss Congeniality. During my year as Miss Kentucky United States, I became familiar with the Mrs. United States brand.

3. Since 2015, I have contracted with Mrs. United States to serve as the State Director for Mrs. United States pageants held in Kentucky. I took over this role from Stephi Williams who was the Mrs. United States National Director until recently.

4. As Kentucky State Director, I am responsible for recruiting contestants and running the state-level Mrs. United States pageants. A copy of a contract I digitally signed on August 10, 2017 to be a licensee of the Miss United States pageant and other divisions is attached as **Exhibit T**.

Mrs. United States Kentucky Facebook Pages

5. When I took over as Kentucky State Director, Stephi Williams granted me administrator privileges of four Mrs. United States Facebook pages on or about October 31, 2015. These pages were used to promote the Mrs. United States brand and to recruit contestants in Kentucky. These pages were called: “Kentucky United States Pageants”; “Miss Kentucky United States”; “Miss Teen Kentucky United States”; and “Miss Jr Teen Kentucky United States” (collectively referred to as “Kentucky Facebook pages”).

6. I devoted time and attention to the Kentucky Facebook pages. When I took them over, these pages had around 200 “Likes”. By the time of the 2018 National Pageant, the Kentucky Facebook pages had approximately “4,000 Likes”. The Mrs. United States brand was used to build this following.

7. The Kentucky Facebook pages contained links where contestants and prospective contestants would be directed to Mrs. United States’ website, where they could sign up to compete in various categories of Mrs. United States pageants.

8. I estimate that I recruited over 20 state-level contestants per year using the Kentucky Facebook pages. Each year, 1 to 2 of the contestants recruited through the Kentucky Facebook pages advanced to the National Pageant.

9. The 2018 National Pageant was held from July 2 – July 7 near Orlando, Florida. Before the 2018 National Pageant, Stephi Williams requested that I again make her an administrator of the Kentucky Facebook pages. After I made Stephi an administrator, she downgraded my privileges from administrator and I was only allowed to edit the page.

10. On or about July 19, 2018 Stephi Williams called me and informed me that she was going to remove my access to the Facebook pages entirely. Stephi removed my access from the Facebook pages on or about July 23, 2018. By that date, I could no longer edit the Kentucky Facebook pages.

11. After the National Pageant, Stephi Williams worked for Cosmos International Pageants (“Cosmos”), a competitor of Mrs. United States.

12. On or about July 30, 2018, before the Kentucky Facebook pages were taken down, I visited the “Kentucky United States Pageants” page and observed that it was being converted to a page promoting Cosmos.

13. On or about August 24, 2018, this same page was active and was called “Kentucky Cosmos United States Pageants”. The “Events” section, showed a list of past “Miss Kentucky United States” pageants some of which I oversaw as State Director or competed in as a contestant.

14. Further, “Page Information” showed that it was created on January 12, 2012 and was previously named “Miss Kentucky United States Organization” and “Kentucky United States Pageants”. The page name was switched to “Kentucky Cosmos United States

Pageants” on July 25, 2018. The contact information listed “director@misskentuckyus.com” as an email address. Instead of linking to Mrs. United States pageant websites, the Facebook page linked to Cosmos’ Facebook page. Screenshots representing what this page showed on or about August 24, 2018 are attached as **Exhibit U**.

15. Most of the content that I posted to the “Kentucky United States Pageants” Facebook page was deleted by either Stephi Williams or the Cosmos Kentucky Director, Summer Blalock. The vast majority of the approximately 3,700 individuals who follow of this page were drawn in through my efforts and the Mrs. United States brand.

2018 National Pageant

16. As National Director, Stephi was responsible for organizing the National Pageant. In past years, contestants would receive designer gifts for participating in the National Pageant. This year, the contestants were given unimpressive gifts.

17. A successful National Pageant is important to the success of future pageants and the recruitment of future contestants. The final day of the National Pageant ran nearly two hours behind schedule. The state-level Mrs. United States Pageant in Kentucky that I oversaw was better organized and ran more efficiently than the National Pageant.

18. I believe that Stephi Williams ran a poor National Pageant this year because she was leaving her role with Mrs. United States.

19. On July 3, 2018, during National Pageant Orientation held at the Omni Championsgate Hotel, Stephi spoke about her new Cosmos pageant system to the contestants and their families for nearly an hour. I was in the room with my contestants and heard these remarks.

20. On July 4, 2018, I received an email from Stephi Williams threatening me and the other State Directors not to compete with her company, Crown Garland, LLC, and instructing us not to speak with Tony Ilacqua. The email further described Tony Ilacqua as “an unauthorized person.” A copy of this email is attached as **Exhibit V**.

21. On July 7, 2018, during the finals before the winner was crowned, Stephi Williams paused the National Pageant and played a commercial promoting Cosmos to the entire audience, including contestants and their families. The lights were lowered and the commercial played on a movie-sized screen behind the stage. The end of the video displayed the Cosmos International Pageants’ website address.

22. On July 8, 2018, the day after the National Pageant ended, I received an email from Stephi Williams, threatening legal action against me and the other state directors if we communicated with Tony Ilacqua and Mrs. United States. A copy of this email is attached as **Exhibit W**. It has always been my understanding that I was a State Director for Mrs. United States, and that I was only dealing with Stephi in her role as National Director for Mrs. United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2018.

s/ Katy Moody Cusick

KATY MOODY CUSICK